

HEATHER E. WILLIAMS, SBN 122664  
Federal Defender  
HOOTAN BAIGMOHAMMADI, SBN 279105  
Assistant Federal Defender  
Designated Counsel for Service  
801 I Street, Third Floor  
Sacramento, CA 95814  
T: (916) 498-5700  
F: (916) 498-5710

Attorneys for Defendant  
Mr. Pereira

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

|                           |  |
|---------------------------|--|
| UNITED STATES OF AMERICA, | ) Case No. 2:22-CR-00047-JAM               |
| Plaintiff,                | )  |
| vs.                       | ) <b>STIPULATION AND ORDER TO CONTINUE</b> |
|                           | ) <b>STATUS HEARING AND EXCLUDE TIME</b>   |
| OLYIMPUS SHAQUILLE        | ) Date: May 3, 2022                        |
| PEREIRA,                  | ) Time: 9:30 a.m.                          |
| Defendant.                | ) Judge: John A. Mendez                    |

IT IS HEREBY STIPULATED and agreed by and between United States Attorney Phillip A. Talbert, through Assistant United States Attorney Alstyn Bennett, counsel for Plaintiff, and Federal Defender Heather Williams, through Assistant Federal Defender Hootan Baigmohammadi, counsel for Defendant Olyimpus Shaquille Pereira, that the previously scheduled Status Hearing set for May 3, 2022 be continued to June 28, 2022 at 9:30 a.m.

The parties specifically stipulate as follows:

1. By previous order, the Status Hearing is currently scheduled for May 3, 2022 at 9:30 a.m. Time has been ordered excluded through that date.
2. Mr. Pereira respectfully requests that the Court continue the Status Hearing to June 28, 2022 at 9:30 a.m.
3. The government has produced 182 pages and various audio/video recordings in discovery. Mr. Pereira requires additional time to review the discovery;

investigate and research possible defenses; research potential pretrial motions; explore potential resolutions to the case; and otherwise prepare for trial.

4. Mr. Pereira believes that failure to grant his motion would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
5. The government does not object to Mr. Pereira's motion.
6. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial Act), the parties request that the time period between May 3, 2022 and June 28, 2022, inclusive, be deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv) (Local Code T4), because it would result from a continuance granted by the Court at the defense's request, based on a finding that the ends of justice served by granting the continuance outweighs the best interest of the public and Mr. Pereira in a speedy trial.

Respectfully submitted,

HEATHER E. WILLIAMS  
Federal Defender

Date: April 28, 2022

/s/ Hootan Baigmohammadi  
HOOTAN BAIGMOHAMMADI  
Assistant Federal Defender  
Attorneys for Defendant  
Mr. Pereira

Date: April 28, 2022

PHILLIP A. TALBERT  
United States Attorney

/s/ Alstyn Bennett  
ALSTYN BENNETT  
Assistant United States Attorney  
Attorneys for Plaintiff

**ORDER**

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Date: April 29, 2022

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ  
UNITED STATES DISTRICT COURT JUDGE